
From: John McCoy [jmccoy@mlllaw.com]
Sent: Saturday, May 25, 2013 2:23 PM
To: Jim Klick
Cc: John McCoy; david.vansoest@tceq.texas.gov; kelly.cook@tceq.texas.gov; kathleen.decker@tceq.texas.gov; susan.jablonski@tceq.texas.gov; don.holmstrom@csb.gov; daniel.horowitz@csb.gov; chris.lyon@csb.gov; johnnie.banks@csb.gov; Quinones, Edwin; Hayes, Mark; lewis.jeffrey@dol.gov; Le, Madeleine - SOL; rector.jack@dol.gov; Schoen, Michael - SOL; Hayes Fuller; Charles Keith; Matt Wilber; Mark Grotefeld; Zona Jones; Patrick Gareis; Waylon Pickett; Anooj Thakrar; Kevin Mosley; ktaunton@ttsslawfirm.com; fredwilson@up.com; Laurence Leavitt; Brook Laskey; Eugene LaFlamme; Matt Rosek; Lori Brown
Subject: Re: AN removal draft protocol

3-4 is date. Crane wanted 4-5 but the county sheriff and police chief insisted on 3-4. I am not happy with these dates as well. One of my experts is in trial with me. Another is in an inspection out East with another of my partners.

So, I like everyone else is being forced to make these dates work.

John

Sent from my iPhone

On May 25, 2013, at 1:59 PM, "Jim Klick" <JKLICK@hhklawfirm.com> wrote:

John: In your email you indicate inspections on June 3rd and 4th, but when we discussed this on Thursday last week, I understood that the inspections would be June 4th & 5th. Please clarify as I have been telling experts that the inspections will start the 4th through the 5th.

From: John McCoy [<mailto:jmccoy@mlllaw.com>]
Sent: Saturday, May 25, 2013 1:20 PM
To: 'david.vansoest@tceq.texas.gov'; 'kelly.cook@tceq.texas.gov'; 'kathleen.decker@tceq.texas.gov'; 'susan.jablonski@tceq.texas.gov'; 'don.holmstrom@csb.gov'; 'daniel.horowitz@csb.gov'; 'chris.lyon@csb.gov'; 'johnnie.banks@csb.gov'; 'quinones.edwin@epa.gov'; 'hayes.mark@epa.gov'; 'lewis.jeffrey@dol.gov'; 'Le, Madeleine - SOL'; 'rector.jack@dol.gov'; Schoen, Michael - SOL; Hayes Fuller; Charles Keith; Matt Wilber; 'Mark Grotefeld'; 'Zona Jones'; Jim Klick; 'Patrick Gareis'; 'Waylon Pickett'; 'Anooj Thakrar'; 'Kevin Mosley'; 'ktaunton@ttsslawfirm.com'; 'fredwilson@up.com'
Cc: Laurence Leavitt; Brook Laskey; Eugene LaFlamme; Matt Rosek; Lori Brown
Subject: FW: AN removal draft protocol

All,

Attached is the drat protocol for AN removal at the site.

I understand state and federal agencies want the removal to occur as soon as possible and before the inspection of June 3-4.

This protocol was put together in consultation with the AN manufacturer. A representative of the AN manufacturer was brought on site on Wednesday of last week to observe the rail car and its contents.

I would like to get approval for TCEQ on this plan or advise of changes.

I understand that the railroad, UP, is interested in removing the railcar once the AN is removed. They are on this e-mail and we ask they coordinate with Crane Engineering for this removal. It will require a protocol that is acceptable to the people on this e-mail.

When we have an approved plan to remove the AN and railcar we will pick a date to implement the plan. We plan to video that removal and share with all "interested parties".

We do not intend to have all "interested parties" attend the removal of the AN or the railcar.

John

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From: Charles Keith [<mailto:chuckk@craneengineering.com>]
Sent: Thursday, May 23, 2013 8:55 PM
To: John McCoy
Cc: Matt Wilber
Subject: AN removal draft protocol

John

Here is a draft protocol for your review.

Please call to discuss

C

Charles G. Keith, P.E.
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<image001.jpg>

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